

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BALTIMORE DIVISION**

JASON ALFORD *et al.*,

Plaintiffs,

v.

THE NFL PLAYER DISABILITY &  
SURVIVOR BENEFIT PLAN *et al.*,

Defendants.

Case No. 1:23-cv-00358-JRR

**DECLARATION OF HESSAM (“SAM”) VINCENT IN SUPPORT OF  
DEFENDANTS’ OPPOSITION TO PLAINTIFFS’  
MOTION FOR CLASS CERTIFICATION**

I, Hessam (“Sam”) Vincent, hereby declare pursuant to 28 U.S.C. § 1746, under the penalty of perjury, that the following is true and correct; that I have personal knowledge of the matters set forth herein, or knowledge based on my review of business records; and that, if called to testify as a witness in this action, I could and would testify competently thereto:

**I. ADMINISTRATIVE RECORDS**

1. Through my employment as the Disability Relations Manager at the NFL Player Benefits Office (“NFLPBO”) in Baltimore, Maryland, I have access to the Administrative Records and related data for each of the named Plaintiffs in this litigation, which identify which specific Neutral Physicians and Medical Advisory Physicians (“MAP”) examined each Plaintiff in connection with Plaintiffs’ applications and appeals, as well as the determination letters by the Disability Initial Claims Committee (the “Committee”) and the Disability Board (the “Board”).

**II. PLAINTIFF JASON ALFORD**

2. Mr. Alford was examined by the following Neutral Physicians in connection with his March 2019 application and appeal:

- a. Dr. Robert Bornstein
- b. Dr. Chad Hoyle
- c. Dr. David Clark
- d. Dr. Neal Deutch

3. Mr. Alford was examined by the following Neutral Physicians in connection with his and January 2022

- a. Dr. Charlene Bang
- b. Dr. Salman Azhar
- c. Dr. Barry McCasland
- d. Dr. Ernest Fung

4. Attached hereto as **Exhibit A** are true and correct copies of the Committee's and Board's decision letters for Mr. Alford's applications and appeals.

**III. PLAINTIFF DANIEL LOPER**

5. Mr. Loper was examined by the following Neutral Physicians in connection with his March 2020 application and appeal:

- a. Dr. David Apple
- b. Dr. Marcus Cook

6. Attached hereto as **Exhibit B** are true and correct copies of the Committee's and Board's decision letters for Mr. Loper's application and appeal.

**IV. PLAINTIFF WILLIS MCGAHEE**

7. Mr. McGahee was examined by the following Neutral Physicians in connection with his February 2020 application and appeal:

- a. Dr. George Diaz
- b. Dr. Martin Strassnig
- c. Dr. Tom Crum
- d. Dr. Kevin Kessler
- e. Dr. Herndon Murray
- f. Dr. Matthew Norman
- g. Dr. Matthews Gwynn
- h. Dr. Jason King

8. Attached hereto as **Exhibit C** are true and correct copies of the Committee's and Board's decision letters for Mr. McGahee's application and appeal.

V. **PLAINTIFF MICHAEL MCKENZIE**

9. Mr. McKenzie was examined by the following Neutral Physicians in connection with his December 2018 application and appeal:

- a. Dr. Paul Saenz
- b. Dr. Eric Brahlin
- c. Dr. Janya Mercado
- d. Dr. Raymond Faber
- e. Dr. Virgil Medlock
- f. Dr. Barry McCasland
- g. Dr. Stephen Macciocchi
- h. Dr. Matthew Norman

10. Mr. McKenzie was examined by the following Neutral Physicians in connection with his April 2021 application and appeal:

- a. Dr. Prem Parmar
- b. Dr. David Clark
- c. Dr. Neal Deutch
- d. Dr. John Rabun
- e. Dr. Hussein Elkousy
- f. Dr. Annette Okai
- g. Dr. Laura Lacritz
- h. Dr. Martin Strassnig

11. Attached hereto as **Exhibit D** are true and correct copies of the Committee's and Board's decision letters for Mr. McKenzie's applications and appeals.

**VI. PLAINTIFF JAMIZE OLAWALE**

12. Mr. Olawale was examined by the following Neutral Physicians in connection with his March 2021 application and appeal:

- a. Dr. Paul Saenz
- b. Dr. Matthew Norman
- c. Dr. Eric Brahlin
- d. Dr. Justin O'Rourke
- e. Dr. Hussein Elkousy
- f. Dr. Annette Okai
- g. Dr. David Salisbury
- h. Dr. John Rabun

13. Attached hereto as **Exhibit E** are true and correct copies of the Committee's and Board's decision letters for Mr. Olawale's application and appeal.

**VII. PLAINTIFF CHARLES SIMS**

14. Mr. Sims was examined by the following Neutral Physicians and MAP in connection with his May 2020 application and appeal:

- a. Dr. Hussein Elkousy
- b. Dr. John Rabun
- c. Dr. Eric Brahlin
- d. Dr. Douglas Cooper
- e. Dr. Christine Chang (MAP)

15. Attached hereto as **Exhibit F** are true and correct copies of the Committee's and Board's decision letters for Mr. Sims's application and appeal.

**VIII. PLAINTIFF ERIC SMITH**

16. Mr. Smith was examined by the following Neutral Physicians in connection with his January 2019 application and appeal:

- a. Dr. Glenn Perry
- b. Dr. Chad Hoyle
- c. Dr. Sutapa McNasby
- d. Dr. Moira Artigues
- e. Dr. Alvin Detterline
- f. Dr. Mark Tullman
- g. Dr. Nicole Werner
- h. Dr. John Rabun

17. Attached hereto as **Exhibit G** are true and correct copies of the Committee's and Board's decision letters for Mr. Smith's application and appeal.

**IX. PLAINTIFF JOEY THOMAS**

18. Mr. Thomas was examined by the following Neutral Physicians in connection with his March 2019 application and appeal:

- a. Dr. Lawrence Murphy
- b. Dr. Alan Breen
- c. Dr. Eric Brahin
- d. Dr. Francisco Perez

19. Attached hereto as **Exhibit H** are true and correct copies of the Committee's and Board's decision letters for Mr. Thomas's application and appeal.

**X. PLAINTIFF LANCE ZENO**

20. Mr. Zeno was examined by the following Neutral Physicians in connection with his September 2020 application and appeal:

- a. Dr. Dean Delis
- b. Dr. Laura Desadier
- c. Dr. Lauren Drag
- d. Dr. Selena Ellis
- e. Dr. William Garmoe
- f. Dr. Silvana Riggio

21. Attached hereto as **Exhibit I** are true and correct copies of the Committee's and Board's decision letters for Mr. Zeno's application and appeal.

Executed this 18th day of November, 2024 at Baltimore, Maryland.

Hessam Vincent  
Hessam ("Sam") Vincent